

REMARKS

Reconsideration of the above-referenced application is respectively requested in view of the above amendments and these remarks. Claims 1-17 are currently pending.

Claims 1-17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over the admitted prior art in view of United States Patent No. 7,200,400 B2 to Creamer et al. and further in view of United States Patent No. 6,751,204 B1 to Foti et al. Applicants have reviewed the pending claims, Creamer, Foti and the Office Action. Applicants have amended claims 1 and 9 to clarify the claimed invention and to obviate the rejection. In particular, Applicants have amended the claims to indicate that the bearer traffic is directly routed from the local gateway, which is in proximity to the calling party, to the called party in the second network that is in proximity to the called party. No new matter is added by this amendment to the claims and adequate support can be found at least in FIG. 1 and the accompanying text of the Specification.

Applicants have previously described the claims, the admitted prior art and Creamer as well as described the patentability of the claims. Those arguments are incorporated here by reference and will not be repeated by unless otherwise necessary.

The claims avoid tromboning of bearer traffic in a network of a called party by having the new network, i.e. the claimed first network of the calling party, determine a gateway that directly routes the bearer traffic to the network of the called party. The claims also avoid tromboning by having the gateway be chosen based on its location relative to the calling party. Once the gateway in proximity to the calling party is located, the claims make clear that the bearer traffic is routed directly to the called party in the second network that is in proximity to the called party. Thus, the claims indicate that the call is routed from the calling party to the gateway in the first network to the called party in the second network. The claims do not involve the gateway in the second network, and this is evident when the claims indicate that the bearer traffic is routed from the gateway directly to the called party.

Foti is directed to a method in a 3G.IP network of routing a call from an originating subscriber in an originating network to a mobile terminating subscriber roaming in a visited network, the mobile terminating subscriber having a home network

that maintains location information for the mobile terminating subscriber. When the originating subscriber sends a call origination message to a gatekeeper in the originating network, the gatekeeper obtains location information from the home network for the terminating subscriber. An IP address of a media gateway in the visited network (MGW1) is then obtaining and provided to the media gateway in the originating network (MGW2). The IP address of MGW2 is then sent to the originating subscriber. Thereafter, the call is routed from the originating subscriber through the MGW2 in the originating network directly to MGW1 in the visited network. An MSC Server in the visited network then routes the call to the mobile terminating subscriber. See Abstract.

As is evident from the above description and FIG. 2B, the call is routed from the calling party to a gateway in the first network, from the gateway in the first network to the gateway in the second network and from the gateway in the second network to the called party. Amended claims 1 and 9 require that the bearer traffic be routed directly from the gateway in the first network to the called party thus bypassing the gateway in the second network. In other words, Foti requires that the call be routed though a gateway in the second network that is avoided according to the claims.

In sum, Applicants respectfully submit that the admitted prior art, Creamer and Foti do not disclose the determining the gateway in the first network that directly routes bearer traffic from a gateway in the first network that is proximate to the calling party to a called party in a second network that is proximate to the called party. In view of the foregoing, it is respectfully submitted that the cited combination of the admitted prior art, Creamer and Foti does not disclose, teach or suggest the limitations as required by independent claims 1 and 9. Applicants therefore respectfully submit that amended independent claims 1 and 9 are patentable over the cited combination. As claims 2-8 depend on claim 1 and claims 10-17 depend on claim 9, Applicants submit that these dependent claims are patentable for the same reasons. Applicants request that the rejection under Section 103(a) be withdrawn.

As Applicants have overcome all substantive rejections and objections given by the Examiner and have complied with all requests properly presented by the Examiner, Applicants contend that this Amendment, with the above discussion, overcomes the Examiner's objections to and rejections of the pending claims. Therefore, Applicants

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respectfully solicit allowance of the application. If the Examiner is of the opinion that any issues regarding the status of the claims remain after this response, the Examiner is invited to contact the undersigned representative to expedite resolution of the matter.

Please charge any fees associated herewith, including extension of time fees, to **50-2117**.

Respectfully submitted,
Xenakis, George, et al.

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